

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,

Defendants.

Civil Action No. 5:21-cv-844 (XR)  
(Consolidated Cases)

**THIRD SUPPLEMENT TO PLAINTIFF UNITED STATES'**  
**AMENDED INITIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(e), the United States submits this third supplement to its amended initial disclosures, ECF No. 132-1. The disclosures below reference to the categories set forth in Federal Rule 26(a)(1)(i)-(iv) and by this Court during its November 16, 2021 status conference and are timely consistent with the Parties' Stipulated Disclosure Deadline for General Election Witnesses, ECF No. 512.

*Rule 26(a)(1)(A)(i): The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.*

**1. Additional Tier 1 Individuals:**

- a. Roberto Benavides, c/o Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741. (512) 474-5073. Mr. Benavides will likely have discoverable information regarding the impact of SB 1's mail voting identification provisions on his ability to cast a ballot during the 2022 general election.
- b. Jane Briggs Gamez, c/o Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741. (512) 474-5073. Ms. Briggs Gamez will likely have discoverable information regarding the impact of SB 1's mail voting identification provisions on her ability to cast a ballot during the 2022 general election.

- c. George Rigely, 13246 N. Hunters Cir., San Antonio, TX 78230. (210) 492-4374. Mr. Rigely will likely have discoverable information regarding the impact of SB 1's mail voting identification provisions on his ability to cast a ballot during the 2022 general election.

Date: February 24, 2023

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/s/ Dana Paikowsky  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2023, I served a true and correct copy of the foregoing via electronic mail on all counsel of record.

/s/ Dana Paikowsky

Dana Paikowsky

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